

In Re:	Case No.:	22-19361 (MBK)
BLOCKFI INC., <i>et al.</i> ,	Chapter:	11
	Judge:	Michael B. Kaplan

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**NOTICE OF PROPOSED COMPROMISE or SETTLEMENT OF CONTROVERSY**

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Mohsin Meghji, in his capacity as Plan Administrator for BlockFi Inc. and its debtor affiliates (collectively, the “Wind-Down Debtors”) in the above-referenced chapter 11 cases (the “Chapter 11 Cases”), as successors in interest to BlockFi International Ltd., an exempted company organized and existing under Bermuda law (“BlockFi International”), which is the subject of a liquidation proceeding in Bermuda, in this case proposes a compromise, or to settle a claim and/or action as described below in Adversary Proceeding No. 23-01175 (MBK). If you object to the settlement or compromise, you must file a written objection with the Clerk of the United States Bankruptcy Court, and serve it on the person named below not later 7 days before the hearing date.

**Address of the Clerk:** Clarkson S. Fisher U.S. Courthouse, 402 East State Street, Trenton, NJ 08608

If an objection is filed, a hearing will be held before the Honorable Michael B. Kaplan on February 27, 2024, at 11:00 a.m. at the United States Bankruptcy Court, courtroom no. 8, 402 East State Street, Trenton, New Jersey 08608 (hearing to be scheduled for at least 28 days from the date of the filing of the notice). If no objection is filed the clerk will enter a *Certification of No Objection* and the settlement may be completed as proposed.

**Nature of action:** Prior to reaching settlement, Vrai Nom Investment Limited (“Vrai Nom”) filed a proof of claim against BlockFi International in the amount of \$1,970,878.52 (the “Vrai Nom Claim”). Also, as more particularly described in the *Wind-Down Debtors’ Motion for Entry of an Order Authorizing and Approving the Wind-Down Debtors’ Settlement with Vrai Nom Investment Limited and Granting Related Relief* (the “Motion”) filed contemporaneously herewith, BlockFi International filed a Complaint and a separate motion for damages asserting certain claims against Vrai Nom, including, among others, (i) avoidance, turnover, and recovery actions with respect to property of the estate, (ii) disallowance of Vrai Nom’s claims against BlockFi International, (iii) a claim for stay violation damages, and (iv) a claim for attorneys’ fees and costs (collectively, the “BlockFi Claims”).

On February 1, 2024, the Wind-Down Debtors and Vrai Nom agreed on the terms of a Settlement Agreement and Release of Claims (the “Settlement Agreement”) which settles the Vrai Nom Claim, the BlockFi Claims, and any other dispute or claim between the parties arising under or related to the transaction documents described in the Settlement Agreement.

**Pertinent terms of settlement:** If approved, the proposed settlement with Vrai Nom will fully resolve the parties' claims against one another and prevent the bankruptcy estates from incurring significant ongoing litigation expenses, as detailed in the Motion. However, the parties entered into the Settlement Agreement on a confidential basis and the Wind-Down Debtors filed the Settlement Agreement under seal. The confidentiality of the specific terms of Settlement Agreement must be preserved to prevent prejudice to the Wind-Down Debtors in their ongoing disputes with other litigants. Unsealed copies of the Settlement Agreement have been made available to the Court and the United States Trustee. Any other party that needs to review the Settlement Agreement may seek authorization from counsel to the Plan Administrator directly at the address below, or will otherwise have the opportunity to seek permission from the Court.

Objections must be served on, and requests for additional information directed to:

Name: Matthew T. Ferris, Esq.

Address: Haynes and Boone, LLP, 2801 N. Harwood Street, Suite 2300, Dallas, TX 75201

Telephone No.: (214) 651-5955 | Email: [matt.ferris@haynesboone.com](mailto:matt.ferris@haynesboone.com)

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